

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YIEN-KOO KING,

Plaintiff,

-against-

**ANDREW WANG, SHOU-KUNG WANG, BAO WU
TANG, JIAN BAO GALLERY, ANTHONY CHOU,
CHEN-MEI LIN, WEI ZHENG, YE YONG-QING, YUE
DA-JIN and JOHN DOES 1-9,**

Defendants.

1:14-Civ-07694-(LJL) (JLC)

**NOTICE OF PLAINTIFF'S MOTION
FOR FED. R. CIV. P. RULE 37 SANCTIONS**

PLEASE TAKE NOTICE, that plaintiff Yien-Koo Wang King (the "Plaintiff"), by and through her undersigned counsel, shall move this Court, before the Honorable Lewis J. Liman, at a date and time to be set by the Court, at the United States Courthouse located at 500 Pearl Street, Courtroom 15C, New York, New York, upon the accompanying Memorandum of Law in Support of Motion for Fed. R. Civ. P. Rule 37 Sanctions, dated April 8, 2021, and the Declaration of Timothy Savitsky in Support of Motion, dated April 8, 2021, and the exhibits thereto, and upon all prior pleadings and proceedings herein, for an order pursuant to Fed. R. Civ. P. Rules 37 (b) and (c) striking the affirmative defenses of Defendants Andrew Wang and Shou-Kung Wang to the Plaintiff's First Amended Complaint and issuing adverse inference jury instructions against the Wangs for their non-production/disclosure of evidence relating to certain of their corporations, their corporate accounts, their corporate accountant, and the Shou-

Kung Wang Irrevocable Trust. The Plaintiff will also seek to recover the costs and fees associated with this motion and the Defendants' failure to produce records in accordance with Fed. R. Civ. P. Rules 36(b)(2)(C) and 36(c)(1)(A).

Dated: New York, New York
April 8, 2021

By: /s/Timothy Savitsky
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To: All parties of record via ECF